

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	Case No. 2:19-bk-11998-mcd
KIMBERLY GLASER,	Chapter 13
Debtor.	
KIMBERLY GLASER,	Adv. Proc. No. 2:20-ap-00005-mdc
Plaintiff,	
v.	
WELLS FARGO BANK NATIONAL ASSOCIATION, AS TRUSTEE FOR CARRINGTON MORTGAGE LOAN TRUST, SERIES 2007-FRE1, ASSET-BACKED PASS- THROUGH CERTIFICATES and SELECT PORTFOLIO SERVICING, INC.	
Defendants.	

**DECLARATION OF FRED W. HOENSCH, ESQ. IN SUPPORT OF THE MOTION TO  
DISMISS PLAINTIFF'S ADVERSARY COMPLAINT**

Fred W. Hoensch, Esq., an attorney duly licensed to practice law in the Commonwealth of Pennsylvania declares and affirms under penalty of perjury as follows to the best of his knowledge information and belief:

1. I am partner with the law firm of Parker Ibrahim & Berg LLP, attorneys for Wells Fargo Bank National Association, as Trustee for Carrington Mortgage Loan Trust, Series 2007-FRE1, Asset-Backed Pass-Through Certificates and Select Portfolio Servicing, Inc. (together, "Defendants") in the above-captioned action. I submit this declaration in support of Defendants' Motion to Dismiss the Adversary Complaint of Kimberly Glaser ("Plaintiff") with Prejudice.

2. Attached hereto as composite **Exhibit A** are true and correct copies of the foreclosure complaint (without exhibits) and docket in *Wells Fargo Bank, N.A., as Trustee for the Carrington Mortgage Loan Trust, Series 2007-FRE1, Asset-Backed Pass Through Certificates v. Kimberly Glaser*, at F.J.D. August Term 2017, No. 19146 (the “Foreclosure Action”).

3. Attached hereto as **Exhibit B** is a true and correct copy of the July 16, 2018 judgment entered in favor of Wells Fargo Trust and against Plaintiff in the Foreclosure Action.

4. Attached hereto as composite **Exhibit C** are true and correct copies of Plaintiff’s Chapter 13 Plan and docket from the underlying bankruptcy action captioned *In Re Kimberly Glaser* at Case No. 2:19-bk-11998-mcd (the “Bankruptcy Action”).

5. Attached hereto as **Exhibit D** is a true and correct copy of the November 1, 2019 Stipulation entered into by Plaintiff in the Bankruptcy Action.

6. Attached hereto as **Exhibit E** is a true and correct copy of the Daily Treasury Yield Curve Rates for the year 2006 as provided by the U.S. Department of the Treasury Resource Center, available for viewing online at: <https://www.treasury.gov/resource-center/data-chart-center/interest-rates/Pages/TextView.aspx?data=yieldYear&year=2006>

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

*[signature page to follow]*

Executed on: April 14, 2020

**PARKER IBRAHIM & BERG LLP**

/s/ Fred W. Hoensch

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Wells Fargo Bank National Association, as  
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Trust, Series 2007-FRE1, Asset-Backed  
Pass-Through Certificates and Select  
Portfolio Servicing, Inc.